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VIA ECOURTS

Honorable Anun Subramanian, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, New York 10007

**Re: Go Global Retail, LLC v. Dream on Me Industries, Inc., et al.
Civil Action No. 1:23-cv-07987**

Dear Judge Subramanian:

This firm represents defendants, Dream on Me Industries, Inc. and Dream on Me, Inc (collectively "DOM") in the above referenced matter. We write today jointly with plaintiff, Go Global, LLC ("Plaintiff" or "Go Global") to request an extension of the discovery deadlines in this matter.

This is the second request for an extension of these deadlines. The initial request was filed on July 11, 2024, and Your Honor granted that request in part by letter Order entered on July 15, 2024. However, the letter Order denied the request in part, and it significantly shortened the discovery period from what the parties had requested.

The parties have exchanged close to 60,000 pages of documents and written discovery responses. There have been multiple subpoenas served on third-parties which will likely result in the production of a significant number of additional documents. Additionally, the parties have engaged in some settlement discussions. We also note that Jessica Carroll, Esq, the attorney who had been primarily responsible for the day-to-day handling on this matter for DOM, has recently departed from our firm. As a result, over the last month, I have been working diligently to get caught up to speed on this matter and fill that role.

The parties have also been engaged in discussions to agree upon a discovery schedule for the orderly completion of discovery. Based on these discussions, the parties write jointly today to request that the discovery end date be extended until January 31, 2025 to permit the completion of fact and expert discovery. Notably, the parties have identified at least fifteen (15) witnesses for fact witness depositions.

The parties also respectfully request that the following interim deadlines be set:

Depositions of all fact witnesses to be completed by October 31, 2024

Affirmative expert reports to be served by November 15, 2024

Responsive expert reports to be served by December 31, 2024

Expert Depositions to be completed by January 31, 2025

Summary judgment motions are due February 28, 2025

Oppositions to summary judgment motions are due March 14, 2025

Replies to summary judgment motions are due March 21, 2025

Plaintiff asserts that its claim is well into seven and potentially eight figures. Therefore, the amount of discovery that the parties need to undertake provides strong justification for the above requested discovery extension.

Based on the foregoing, the parties jointly respectfully request that Your Honor enter an Order setting the above deadlines or that Your Honor schedule a Case Management Conference be scheduled.

Respectfully submitted,

GREENBAUM, ROWE, SMITH & DAVIS LLP

/s/ Thomas K. Murphy III

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THOMAS K. MURPHY III

cc: All Counsel of Record (via ECF)

The request for an extension is GRANTED in part. The Court's July 15, 2024 order informed the parties that an extension would only be granted in light of a strong justification. The Court sees no strong justification here. Rather, it seems that the parties waited until the last minute to get discovery going in earnest. Nevertheless, the Court will extend discovery for a period of 45 days, to October 21, 2024. No further extensions for any reason. If there are disputes, the parties should raise them immediately with the Court to make sure that the parties can meet the deadline. The summary judgment deadlines will be moved out 45 days as well.

SO ORDERED



Arun Subramanian, U.S.D.J.
Dated: August 21, 2024